

1 George Haines, Esq.  
2 Nevada Bar No.: 9411  
3 Gerardo Avalos, Esq.  
4 Nevada Bar No.: 15171  
**FREEDOM LAW FIRM**  
5 8985 S. Eastern Ave., Suite 350  
6 Las Vegas, Nevada 89123  
7 (702) 880-5554  
8 (702) 385-5518 (fax)  
9 Ghaines@freedomlegalteam.com  
*Attorneys for Plaintiff Debra K. Sims*

10                   **UNITED STATES DISTRICT COURT**  
11                   **DISTRICT OF NEVADA**

12                   Debra K. Sims,

13                   Case No.: 2:20-cv-02209-KJD-EJY

14                   Plaintiff,

15                   v.  
16                   **Stipulation of dismissal of Bank of**  
17                   **America, N.A. with prejudice**

18                   Early Warning LLC. and Bank of  
19                   America N.A.,

20                   Defendant.

21                   Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Debra K.  
22                   Sims and Bank of America, N.A. stipulate to dismiss Plaintiff's claims against  
23                   Bank of America, N.A. with prejudice.

24                   ///

25                   ///

26                   ///

27

1           Each party will bear its own costs, disbursements, and attorney fees.

2           Dated: May 3, 2021.

3

4           **FREEDOM LAW FIRM**

5           /s/ George Haines

6           George Haines, Esq.

7           Gerardo Avalos, Esq.

8           8985 S. Eastern Ave., Suite 350

9           Las Vegas, Nevada 89123

10          *Counsel for Plaintiff Debra K. Sims*

11

12          **WRIGHT FINLAY & ZAK**

13          /s/ Ramir H. Hernandez

14          Ramir M. Hernandez, Esq.

15          7785 W. Sahara Ave, Suite 200

16          Las Vegas, Nevada 89117

17          *Counsel for Bank of America, N.A.*

18          IT IS SO ORDERED:

19

20

21

22

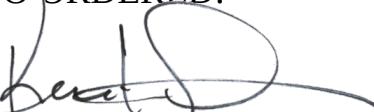
23

24

25

26

27



---

28          UNITED STATES DISTRICT JUDGE

29          DATED: 5/21/2021